

FREEDOM COURT REPORTING

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF ALABAMA
3 NORTHERN DIVISION
4

5 MONICA PERRYMAN,
6 Plaintiff,

COPY

7
8 vs. CIVIL ACTION NO. 2:06-cv-mef
9

10 FIRST UNITED METHODIST CHURCH; and
11 DARLENE MAYE,
12 Defendants.

13 * * * * *

14 DEPOSITION OF PHILLIP SAUNDERS,
15 taken pursuant to notice and
16 stipulation on behalf of the Plaintiff,
17 at Rushton, Stakely, Johnston &
18 Garrett, Montgomery, Alabama, before
19 Bridgette Mitchell, Shorthand Reporter
20 and Notary Public in and for the State
21 of Alabama at Large, on October 10,
22 2006, commencing at 2:38 p.m.
23

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1 Q. Is this a paid position?

2 A. Yes.

3 Q. What's your range of salary?

4 A. Current salary?

5 Q. Yes.

6 A. Sixty-three thousand.

7 Q. What is the business structure of the
8 day care?

9 A. Business structure?

10 Q. Yes.

11 A. Well, there's a director, Ms. Maye, and
12 there is an advisory board, Early
13 Childhood Development Center advisory
14 board, made up of members of the
15 church, parents of children within the
16 center who may or may not be members of
17 the church, and certain staff members
18 of the church.

19 Q. So the legal structure is a
20 corporation? Is it a corporation? I
21 mean --

22 A. The church is incorporated.

23 Q. But is the day care incorporated

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1 separately from the church?

2 A. No. No, it's not a corporation.

3 Q. So the church and the day care are one
4 and the same, so the same directors
5 that control the church control the day
6 care?

7 A. Yes.

8 Q. Okay. So when we're dealing with the
9 day care, we're dealing with,
10 basically, the church, because it's the
11 same entity; it's under the same
12 corporate umbrella?

13 A. Yeah, it's under the same umbrella with
14 a separate -- with a separate advisory
15 board --

16 Q. Okay.

17 A. -- that reports back to the main boards
18 of the church.

19 Q. Okay. Were there any -- were you there
20 when the day care was established?

21 A. Yes.

22 Q. Okay. Were there any bylaws or
23 anything or --